
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

November 29, 2022

OIRA Desk Officer for WHD
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC

Re: Labor Standards for Federal Service Contracts (OMB Control #: 1235-0007)

Dear OIRA Desk Officer,

I am pleased to submit this response to the Wage and Hour Division's (WHD's) invitation for comments to OMB on its information collection request (ICR) regarding Labor Standards for Federal Service Contracts (OMB Control #: 1235-0007), as published in the *Federal Register* on November 28, 2022 (87 FR 73038). My comments are informed by my current efforts as:

- Research Professor, George Washington Institute of Public Policy, George Washington University (GW)
- Co-Principal Investigator, Jobs and Employment Data Exchange-Research Enrichment Project (JEDx-REP), conducted on behalf of the U.S. Chamber of Commerce Foundation (Chamber Foundation)
- Representative of research organizations, [Workforce Information Advisory Council \(WIAC\)](#), U.S. Department of Labor
- Board Member, [Industry Studies Association](#) and chair of its Industrial Policy Committee.

I write to recommend that OMB approve the ICR for Labor Standards for Federal Service Contracts with the term of clearance that WHD ascertain, and report findings to OMB in 12 months on, the feasibility and potential benefits of successor contractors creating the Vacation Benefit Seniority List by obtaining inherited employees' length of service data through administrative record repositories being developed by the Chamber Foundation's [Jobs and Employment Data Exchange \(JEDx\)](#) instead of from predecessor contractors.

JEDx is guided by the [JEDx Partnership](#), which includes representatives of the federal government. Chike Aguh, Chief Innovation Officer, U.S. Department of Labor, has attended meetings. JEDx is about to enter a pilot phase with state labor department partners in California, Texas, Florida, New Jersey, Colorado, Arkansas, and Kentucky. Kerrie Leslie, Senior Statistician in OIRA monitors the JEDx effort as an observer.

In the near term, JEDx aims to have state government unemployment insurance (UI) systems agree to a set of expanded nationwide data standards for UI employment wage records that would, through the creation of employer administrative record trusts, enable a substantial

reduction in respondent burden for employers required to job information to federal and state regulatory and statistical agencies, such as WHD and state labor departments. For reference, JEDx has created an [employment and earnings records data dictionary](#) that includes the data elements currently required by 29 federal and two state information collections, including Vacation Leave Paid (IX.C.1.c.(11)). JEDx is in the process of identifying data elements that would lead to the largest reduction in employer respondent burden.

As indicated in the Labor Standards for Federal Service Contracts supporting statement, WHD estimates that the respondent burden for the Vacation Benefit Seniority List is 136,336 hours at an annual cost of \$6.1 million. From what I can tell, however, this burden estimate does not include the burden placed on predecessor contractors and their payroll providers (e.g., ADP) to submit worker records to successor contractors. In any case, it appears that JEDx has the potential to reduce predecessor/successor contractor and payroll provider burden in building the Vacation Benefit Seniority List, while maintaining, and perhaps improving, information quality, to the benefit of WHD enforcement.

I appreciate the opportunity to provide comments on the ICR for Labor Standards for Federal Service Contracts, hope OMB finds them of value, and look forward to OMB's decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Reamer".

Andrew Reamer
Research Professor

